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December 27, 2021

**VIA ECF**

The Honorable Andrè M. Espinosa, U.S.M.J.  
Martin Luther King, Jr. Courthouse  
50 Walnut Street  
Room 2037, Courtroom 2D  
Newark, NJ 07102

Re: Giordano v. MGC Mortgage, Inc., et al  
Civil Action No.: 2:21-cv-18191-ES-AME

Dear Judge Espinosa:

We represent Defendants MGC Mortgage, Inc. and LNV Corporation in this matter. We write jointly and with consent of counsel for plaintiff Amelia Giordano and co-defendant Dovenmuehle Mortgage, Inc. to respectfully request a 60 day adjournment of the Initial Rule 16 Conference, which is currently scheduled for January 5, 2022. The parties are requesting this adjournment in order to seek to resolve this matter. As part of such resolution discussions, Ms. Giordano will be applying for a loan modification and the parties request the time in order to prepare and process such application. This is the parties' first request for an adjournment of the conference.

If you have any questions, please contact us.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joseph N. Froehlich".

Joseph N. Froehlich

JNF:md